

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

R.M.S. TITANIC, INC.,
successor-in-interest to
Titanic Ventures, limited partnership,
Plaintiff,

v.

Civil Action No. 2:93cv902

THE WRECKED AND ABANDONED VESSEL, et al.,
Defendant.

**PERIODIC REPORT OF R.M.S. TITANIC, INC.
ON THE PROGRESS OF RESEARCH AND
RECOVERY OPERATIONS**

NOW COMES Plaintiff, R.M.S. Titanic, Inc. (“RMST” or the “Company”), by counsel, and files this “Periodic Report of R.M.S. Titanic, Inc. on the Progress of Research and Recovery Operations” (“Periodic Report”).

I. Proposed 2020 SEARCH, Inc. Expedition

On July 10, 2020, James Pochurek, the President of SEARCH, Inc., sent to RMST counsel the letter attached hereto as Exhibit 1. On July 16, 2020, RMST sent Mr. Pochurek the letter attached hereto as Exhibit 2. For the reasons set forth in its July 6 Periodic Report, and in the letter attached hereto as Exhibit 2, the SEARCH expedition should not proceed until it proves to the Court that its plans do not interfere with RMST’s exclusive right of possession of the wreck or this Court’s admiralty jurisdiction.

WHEREFORE, RMST submits this Periodic Report for the Court’s information and consideration.

Respectfully submitted,

RMS TITANIC, INC.

By Counsel:

/s/ Brian A. Wainger

Brian A. Wainger, VSB #38476

William R. Poynter VSB #48672

Ryan V.P. Dougherty VSB#78444

KALEO LEGAL

4456 Corporation Lane, Suite 135

Virginia Beach, VA 23462

Tel: (757) 965-6804

Fax: (757) 304-6175

E-Mail: bwainger@kaleolegal.com

David G. Barger, VSB #21652

GREENBERG TRAURIG, LLP

1750 Tysons Boulevard, Suite 1000

McLean, Virginia 22102

Tel: (703) 749-1300

Fax: (703) 749-1301

Email: BargerD@gtlaw.com

Counsel for R.M.S. Titanic, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2020, a copy of the foregoing has been electronically filed with the Clerk of the Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

/s/ Brian Wainger

Brian A. Wainger, VSB #38476
Attorney for Plaintiff RMS Titanic, Inc.
KALEO LEGAL
4456 Corporation Lane, Suite 135
Virginia Beach, VA 23462
Tel: (757) 965-6804
Fax: (757) 304-6175
E-Mail: bwainger@kaleolegal.com

Counsel for R.M.S. Titanic, Inc.